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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

JUL 2 1990

REPLY TO THE ATTENTION OF:

Richard Shepherd
Project Coordinator
Conestoga - Rovers & Associates, Inc.
10400 W. Higgins Rd., Suite 103
Rosemont, Illinois 60018

Dear Mr. Shepherd:

U.S. EPA and Illinois EPA have reviewed the Second Work Plan Supplement (2nd Supplement) for the Johns-Marville Site in Waukegan, Illinois. The following comments must be addressed for approval to be granted by U.S. EPA and Illinois EPA:

1. Section 2.0 of the original (April 27, 1989) Supplement should be ~~added~~ verbatim to the 2nd Supplement.
added
2. The first and second paragraphs on page 5 of the original supplement should be added verbatim to the 2nd supplement.
3. Provisions for immediate patching of cracks, holes, etc. in the entire east parking lot must be added to the 2nd supplement. Future maintenance of the parking lots may be handled under the O & M Plan, but only if the O & M Plan, including these provisions, is received by U.S. EPA and Illinois EPA prior to approval of the 2nd supplement.
4. Page 1, provision i) - delete "excluding the area presently existing in a 'wetlands' condition" from this provision.
5. Page 1, provisions ii), iii), and iv) - delete these provisions.
6. Page 3, provision xiii) - delete "with saving of selected trees" from this provision.
7. Page 3, provision xv) - if on-site monitoring well casings are to be extended, more detail must be provided regarding how contamination of these wells will be prevented and how the integrity of these wells will be maintained. Unless extension of well is really necessary, this provision should be deleted.

Additionally, the term "protective posts" would be more appropriate than "bollards" (this change is not required for approval).

8. Page 4 and 5, Section 2.2, 2.3, and 2.4 - delete these sections.
9. Page 7, Section 2.5.33 - add provisions for extending the settling basin overflow drain and the collection basin level control lines.
10. Page 9, Section 2.6 - Add the west roadway and the pumping house roadway to this section, and add provisions for drainage lines to the existing northwest roadway or stone.
11. Page 10, Section 2.7.1 - Crushing of asbestos-containing pipe will not be allowed. Pipe may be buried or filled in place. *the*
12. Page 10, last paragraph - add the following sentence to the end of this paragraph: " In the event of any dispute between Manville OSC and the U.S. EPA OSC regarding the the asbestos content of any materials, representative samples shall be taken and analyzed to resolve the dispute".
13. Page 11, Section 2.8.1 - water level control for the two borrow pit areas which will not have it after pipes are filled in must be included in this section, or a satisfactory explanation must be provided. *no hole taken during excavating*
14. Page 13, Last Paragraph - Substitute "consistent with the requirements of this Second Work Plan Supplement. Every effort shall be made to prevent recontamination of previously remediated areas." for "consistent with the requirements of Attachment B to the Work Plan."
15. Page 14, First Paragraph - This paragraph should be replaced with the full paragraph on page 16 of the original Supplement, with the following exceptions:
 - a) "by May 31, 1990," Should be replaced with "within 150 calendar days from U.S. EPA written approval of the Second Work Plan Supplement".
 - b) "of the Site" should be replaced with "this portion of the Site".
 - c) "Spring and Summer of 1990" should be replaced with appropriate language.
16. If no connecting roadway is to be constructed on the old roadway between the north and south roads (as indicated in the 2nd Supplement), a permanent fence should be constructed to stop improper use across this area. *concrete posts*

at

- 17. All surficial ACM should be collected from the area to the western Marville property line (near wells 1 and 2) and disposed of in any area that will receive the 24" cover prior to placement of the cover in said area.
- 18. This comment is not required for approval, but is strongly recommended: A grid sampling effort in areas which are not paved and are not already remediated ~~under this~~ (2nd Supplement) or designated for remediation under this should be undertaken. Samples should be taken to a depth of two feet and analyzed for asbestos. - designate these areas at next visit
- 19. All comments made previously should be represented on the drawings attached to the 2nd Supplement, namely:
 - a. Plan 1 is enclosed with this letter, and additional areas should be shaded as indicated on this enclosure,
 - b. On plan 2, the "wetland" area should be shaded to indicate that a 24" vegetated soil cover will be applied to this area, and
 - c. On plan 3, Section D-D' should be amended to reflect the application of a 24" vegetated cover to the "wetlands" area, and Detail D should be deleted.

Please amend the 2nd Supplement based on the above comments and submit a final version to U.S. EPA and Illinois EPA as soon as practical.

If you have any questions or comments concerning this letter or would like to request a meeting or conference call to discuss these comments, please contact Brad Bradley and Kurt Neibergall at (312) 886-4742 and (217) 782-9843, respectively.

Sincerely yours,

Brad Bradley *BR*
Brad Bradley
U.S. EPA Remedial Project Manager

will also pave semi-trailer
parking area west of
pumping lagoon

- Attachments Enclosure

cc: Kurt Neibergall, IEPA w/Attachments

PAGE 4
BCC PAGE

HAS BEEN REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION